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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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Seattle, Washington 98101

Reply To  
Attn of: ECL-113

January 30, 1997

Nolan R. Jensen, Acting Manager  
Environmental Restoration Program  
U.S. Department of Energy  
Idaho Operations Office  
785 DOE Place  
Idaho Falls, Idaho 83402

Re: Review of "Draft ICPP Radionuclide-Contaminated Soils  
Removal Action EE/CA"

Dear sir:

Thank you for this opportunity to comment on the January 19, 1997, draft ICPP Radionuclide-Contaminated Soils Removal Action EE/CA. As this action is not under the authority of the FFA/CO, our comments are limited to whether this action is not inconsistent with likely future remedial actions. The draft is well organized and written and a good mix of technology types evaluated. There is some question on how the "No Action" alternative should have been described, but this would have no impact on the selection of the preferred alternative.

In determining risk and whether such action is necessary, no information is provided on whether a risk exists under the current occupational scenario. Given the 30 year half-life for Cs-137, I suspect that back-calculating the risk under the current occupational use scenario, using default parameters would support a current risk. Then, along with existing institutional controls and access barriers, the use of a 100 year future residential scenario threshold cleanup level may be appropriate. The obvious question arises as to why the need to take a removal action now if the perceived threat is only to occur 100 years in the future?

Based on the information contained in the EE/CA, Operable Units 3-07, 3-02, and 3-13 are affected by this action as well as non-specified IDW wastes and other contaminated soils from

existing stockpiles and future maintenance activities. It is not expected that this action will interfere with ongoing remedial activities nor is it inconsistent with future remedial decisions.

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Please contact me at (206) 553-7261 if you require clarification or elaboration on the comments provided.

Sincerely,

Wayne Pierre  
INEL Project Manager

cc: Dean Nygard, IDHW  
Scott Reno, DEQ Idaho Falls Office  
Howard Orlean, EPA